

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

PATRICIA CUMMINGS,

Plaintiff,

- against -

THE CITY OF NEW YORK, *et al.*,

Defendants.

Index No.: 19-CV-1664-SJF

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Declaration of Richard D. Rochford, dated June 28, 2019 and the exhibit thereto, and the accompanying Memorandum of Law dated June 28, 2019, Defendants Hechinger Institute on Education and the Media, an institute of Teachers College, Columbia University and Dr. Andre Perry (collectively, the “Hechinger Defendants”) will move this Court before the Honorable Sandra J. Feuerstein, United States District Judge, at the United States District Court for the Eastern District of New York, 100 Federal Plaza, Central Islip, New York 11722, at a date and time to be determined by the Court, to dismiss the Complaint in this action in its entirety pursuant to Fed. R. Civ. P. 12(b)(6).

PLEASE TAKE FURTHER NOTICE that pursuant to the Court’s Individual Rules, any opposing affidavits and answering memoranda of law must be served within fourteen (14) days of service of this motion. Reply papers, if any, must be served within seven (7) days of service of the opposition papers.

Dated: June 28, 2019
New York, New York

HAYNES AND BOONE, LLP
Attorneys for Hechinger Defendants

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